U.S. ENVIRONMENTAL PROTECTION AGEN
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

RECEIVED
JAN 26 1984

REPLY TO ATTN OF: M/S 533

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

COPY

JAN 20 1984

Roger Nelson, Vice President
Chem-Security Systems, Incorporated
P. O. Box 1866
Bellevue, Washington 98009

Re: Letter of Approval for PCB Disposal
Chem-Security Systems, Incorporated, Arlington, Oregon

Dear Mr. Nelson:

This is in partial response to the recent confirmation of shallow unconfined ground water underlying the Chem-Security Systems, Incorporated (CSSI) disposal site near Arlington, Oregon and a request from CSSI for amendment of the currently effective Letter of Approval for the disposal of polychlorinated biphenyls (PCB).

The Letter of Approval for PCB disposal, issued to CSSI by the Environmental Protection Agency (EPA) dated March 25, 1982, found that the two deep wells existing onsite at the time provided adequate monitoring of the underlying ground water. In that document, paragraph (3)(b) of the APPROVAL CONDITIONS, Part B. Waivers of Special Technical Requirements, states that ground water occurs under confined conditions at about 560 feet below the surface and that a uniform slope in one direction exists. Since that time, it has been determined that the hydrogeology of the site is complex and that a shallow unconfined aquifer underlies part or all of the site. Therefore, the partial waiver found in Part B, paragraph (3)(b), of the APPROVAL CONDITIONS is hereby revoked.

Based on the new hydrogeologic findings and to initiate the installation of a ground-water monitoring system at CSSI, Special Condition (24) is hereby revised, effective immediately, as follows:

. . .

(24)(a) Observation wells shall be installed within the PCB portion of trenches at a site where the bottom of the PCB portion of the trench is at its lowest elevation. These observation wells shall extend to the bottom of the trench and shall be at least 4 inches in diameter and adequately perforated to collect fluids. [A leachate interceptor drain and collection system may be installed for the PCB disposal portion of Trench 5 and may be used in lieu of an observation well in this trench. The drain and system shall be adequate to collect liquid eminating from

the PCB disposal portion of Trench 5.] The observation wells in the PCB disposal portion of trenches (and the leachate interceptor drain and collection system for Trench 5) shall be checked monthly for the presence of liquid. If greater than 50 cubic centimeters of liquid is detected, a sample shall be taken and analyzed for the following parameters:

1. PCB's (detectability to 1.0 parts per billion (ppb))
2. pH
3. Specific Conductance
4. Total Organic Halogens (detectability to 1.0 ppb)
5. Chlorides (detectability to 1.0 parts per million (ppm))

When monitoring shows that some liquid has accumulated in the bottom of a trench (or in the interceptor drain and collection system), it shall be removed immediately by pumping or bailing. A contemporaneous written record shall be kept of the liquid volume and date of removal. Any liquid removed from the wells (or interceptor drain and collection system) shall be stored pursuant to this approval for subsequent incineration unless tested and found to contain less than 500 ppm PCB's.

(b) A ground-water monitoring system shall be established which is adequate to monitor the uppermost aquifer underlying the site. At a minimum, this system shall consist of the following:

(i) Monitoring well MW-1 as constructed and located shall be maintained.

(ii) A monitoring well shall be constructed and maintained along the western perimeter of the facility, north of the bore hole described as B-1 (shown on Attachment B of the technical report submitted March 10, 1978, by Chem-Nuclear Systems, Inc.) but south of the anticline.

(iii) A monitoring well shall be constructed and maintained at a location not more than 150 feet south of Trench 8 in an area near the midpoint of the southern boundary of Trench 8.

Construction of the wells required under (24)(b)(ii) and (iii) should proceed as described in the RCRA Part B permit application (page F-32, revision 0). In addition, monitoring wells shall be designed, constructed and maintained such that they reach the first monitorable zone. Monitoring wells shall be sampled monthly after construction. Samples shall be analyzed for the parameters listed in Special Condition (24)(a).

The static water level in each monitoring well shall be obtained prior to sampling each month for the first year after well installation and quarterly thereafter.

. . .

In order to ensure that monitoring of the uppermost aquifer begins as soon as possible, construction of monitoring wells should begin without delay. Special Condition (24) has been revised to reflect this need and the following schedule for installation must be met:

1. Monitoring well MW-1, required by (24)(b)(i), is in place and is being monitored.

2. The monitoring wells required by (24)(b)(ii) and (iii) have been installed. The first monthly sampling shall be conducted no later than February 15, 1984.

It is assumed that the first monitorable zone is in the sedimentary materials overlying the Priest Rapids Basalt. If this proves to be dry or not a monitorable zone and a deep well in the basalt is required, a revised well design should be submitted to EPA Region 10 for approval prior to deep well construction.

As agreed during the meeting held on November 29, 1983, between representatives of CSSI and EPA, the proposed requirement for two monitoring wells near the PCB disposal trenches will not be incorporated in the Letter of Approval at this time. Please note that additional wells may be required in the future as necessary to define and adequately monitor underlying ground water.

A plan and schedule for installation of the interceptor drain and collection system (for the PCB disposal portion of Trench 5), which includes detailed information on design and construction specifications, must be submitted by February 20, 1984, to the contact person, designated below, for approval by EPA. The plan and schedule must include information previously requested and verbally transmitted to EPA. Detailed drawings of the interceptor drain, as constructed, must be submitted to the contact person within 15 days of completion of the drain (or receipt of this letter if the drain has been constructed).

CSSI has requested that Special Condition (37) be amended. Regarding Special Condition (37)(b), CSSI requested that language be added to more clearly define this reporting requirement. EPA has agreed to do so. Therefore, Special Condition (37)(b) is hereby revised, effective immediately, as follows:

. . .

(37) (b) If Chem-Security Systems, Inc., believes or has reason to believe that improper disposal or that an environmental release, spill, or other uncontrolled discharge of PCB's has or might have occurred at the facility or during transport, the operator of the disposal site shall inform the EPA Region 10 office within two business days. A written report of the incident shall be submitted to EPA Region 10 within 2 weeks of the incident or of its initial discovery.

. . .

Where uncertainty exists pertaining to actual implementation of this reporting requirement, CSSI shall notify EPA of the situation and file the required report pursuant to Special Condition (37)(b) unless EPA advises CSSI in writing not to do so.

Regarding Special Condition (37)(c), CSSI has requested, on several occasions, that this reporting requirement be clarified. EPA has determined that this reporting requirement is not central to agency monitoring of PCB disposal activities at the site. Compliance with appropriate occupational safety and health regulations and attendant records maintained by CSSI should be adequate. Therefore, Special Condition (37)(c) is hereby deleted, effective immediately.

CSSI has also requested that EPA compile all modifications of the currently effective Letter of Approval since the date of issuance (March 25, 1982) into a single document for ease of reference. Although not essential, EPA agrees that reprinting the Letter of Approval, as revised to date, would facilitate reference and intends to do so as soon as possible.

Please note that today's modification of the March 25, 1982 Letter of Approval (and as subsequently revised) in no way relieves CSSI of the regulatory and approval requirements for proper disposal of PCB's previously in effect.

Inquiries or correspondence regarding this matter should be directed to the contact person: Mr. George C. Hofer, U.S. Environmental Protection Agency, Mail Stop 533, 1200 Sixth Avenue, Seattle, Washington 98101, or telephone (206) 442-2803.

Sincerely,

Ernesta B. Barnes
Regional Administrator

cc: Richard Reiter, Department of Environmental Quality, Portland
Al Goodman, EPA, Portland